

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases Noted on Attached Exhibit

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND ORDER DISMISSING WITH PREJUDICE CLAIMS
PURSUANT TO FLORIDA ENDO SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, “Dismissing Plaintiffs”) and Defendants Endo Health Solutions Inc., Endo Pharmaceuticals Inc., Endo International plc, Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. (collectively, “Endo and Par Defendants”¹) that, pursuant to the election of each Dismissing Plaintiff to participate in the Endo Settlement Agreement attached hereto as Appendix B, all claims of each Dismissing Plaintiff against any Endo or Par Defendant are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs.

¹ The Endo Settlement Agreement is between the State of Florida, Office of Attorney General on the one hand and Endo Health Solutions Inc. and Endo Pharmaceuticals Inc. on the other, but the Endo Settlement Agreement provides for participation by Dismissing Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all “Releasees,” which include not only Endo Health Solutions Inc. and Endo Pharmaceuticals Inc. but also the other Endo and Par Defendants defined herein. Endo Settlement Agreement §A(cc) & Ex. D (attached as Appendix B). To the extent the parties discover that any Released Claim of any Dismissing Plaintiff remains pending against any Releasee following filing of this stipulation, the parties shall stipulate to the dismissal of those claims in a subsequent filing.

Dated: May 3, 2022

Respectfully submitted,

Agreed as to form and substance:

/s/ John H. Beisner

John H. Beisner
Jessica Davidson Miller
SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP
1440 New York Avenue, NW
Washington, DC 20005
Tel: (202) 373-7000
Email: john.beisner@skadden.com
Email: jessica.miller@skadden.com

/s/ Carole Schwartz Rendon

Carole Schwartz Rendon
Baker & Hostetler LLP
127 Public Square
Key Tower, Suite 2000
Cleveland, OH 44114-1214
(216) 861-7420
Email: crendon@bakerlaw.com

*Attorneys for Defendants Endo Health
Solutions, Inc., Endo Pharmaceuticals Inc.,
Par Pharmaceutical, Inc. and Par
Pharmaceutical Companies, Inc.*

/s/ Mark J. Dearman

Mark J. Dearman (FL Bar No. 982407)
ROBBINS GELLER RUDMAN
& DOWD LLP
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
(561) 750-3000
(561) 750-3364 (Fax)
mdearman@rgrdlaw.com

Counsel for

Brevard County (1:19-op-45064-DAP)
Broward County (1:18-op-45332-DAP)
City of Pompano Beach (1:19-op-45087-
DAP)
City of Coconut Creek (1:19-op-45089-DAP)
City of Delray Beach (1:18-op-45051-DAP)

/s/ Matthew S. Daniel

Matthew S. Daniel
FERRER POIROT & WANSBROUGH
2603 Oak Lawn Ave., Suite 300
Dallas, TX 75219
(214) 521-4412
(866) 513-0115 (Fax)
mdaniel@lawyerworks.com

Counsel for Lee County (1:19-op-45671-
DAP)

/s/ Bernice C. Lee

Bernice C. Lee (FL Bar No. 0073535)
KOZYAK TROPIN & THROCKMORTON,
LLP
2525 Ponce de Leon Boulevard, 9th Floor
Coral Gables, FL 33134
(305) 372-1800
(305) 372-3508 (Fax)
blee@kttlaw.com

Counsel for the City of Coral Gables (1:18-op-
45852-DAP)

/s/ Thomas L. Young

Thomas L. Young (FL Bar No. 0231680)
LAW OFFICE OF THOMAS L. YOUNG, P.A.
3302 West Mullen Avenue
Tampa, FL 33609
(813) 251-9706
tyoung@tlylaw.com

Counsel for Polk County (1:18-op-45970-DAP)

/s/ Travis R. Walker

Travis R. Walker (FL Bar No. 36693)
THE LAW OFFICES OF TRAVIS R.
WALKER, P.A.
1100 SE Federal Highway
Stuart, FL 34994
(772) 708-0952
traviswalker@traviswalkerlaw.com

Counsel for City of Stuart (1:20-op-45124-DAP)

/s/ Peter J. Mougey

Peter J. Mougey (FL Bar No. 191825)
LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN, BARR,
MOUGEY, P.A.
316 South Baylen Street
Pensacola, FL 32502
(850) 435-7000
pmougey@levinlaw.com

Counsel for

Bay County (1:18-op-45455-DAP)

Calhoun County (1:18-op-45363-DAP)

City of Bradenton (1:18-op-46331-DAP)

City of Miami Gardens (1:18-op-45873-DAP)

City of New Port Richey (1:19-op-46073-DAP)

City of Niceville (1:21-op-45081-DAP)

City of North Miami (1:18-op-45872-DAP)

City of Ormond Beach (1:19-op-46121-DAP)

City of Panama City (1:18-op-45373-DAP)

City of Pensacola (1:18-op-45331-DAP)

City of Pinellas Park (1:18-op-45807-DAP)

City of St. Petersburg (1:18-op-45701-DAP)

City of Tallahassee (1:18-op-46243-DAP)
Escambia County (1:18-op-45729-DAP)
Gulf County (1:18-op-45953-DAP)
Hernando County (1:19-op-45667-DAP)
Holmes County (1:18-op-45456-DAP)
Jackson County (1:19-op-45283-DAP)
Leon County (1:18-op-46242-DAP)
Miami-Dade County (1:18-op-45552-DAP)
Pasco County (1:18-op-45851-DAP)
Pinellas County (1:18-op-45742-DAP)
Santa Rosa County (1:18-op-45861-DAP)
Volusia County (1:18-op-45782-DAP)

/s/ Michael C. Moore

Michael C. Moore
MIKE MOORE LAW FIRM, LLC
P.O. Box 321048
Flowood, MS 39232
(601) 933-0070
mm@mikemoorelawfirm.com

Counsel for Hillsborough County (1:18-op-46281-DAP) and City of Tampa (1:18-op-46282-DAP)

/s/ James D. Young

James D. Young (FL Bar No. 567507)
MORGAN & MORGAN COMPLEX
LITIGATION GROUP
76 S. Laura Street, Suite 1100
Jacksonville, FL 32202
(904) 361-0012
(904) 366-7677 (Fax)
jyoung@forthepeople.com

Counsel for

City of Deerfield Beach (1:18-op-45021-DAP)
City of Fort Lauderdale (1:18-op-46329-DAP)
City of Hallandale Beach (1:18-op-45119-DAP)
City of Lauderhill (1:18-op-45119-DAP)
The County Commission of Monroe County (1:18-op-45273-DAP)
City of Orlando (1:20-op-45223-DAP)
City of Miramar (1:19-op-45088-DAP)
City of Pembroke Pines (1:18-op-46363-DAP)

/s/ Shayna E. Sacks

Shayna E. Sacks
NAPOLI SHKOLNIK, PLLC
360 Lexington Avenue, 11th Floor
New York, NY 10017
(212) 397-1000
ssacks@napolilaw.com

Counsel for

Alachua County (1:18-op-45685-DAP)
Levy County (1:18-op-46119-DAP)
Okaloosa County (1:19-op-45894-DAP)
Osceola County (1:18-op-45669-DAP)
Palm Beach County (1:18-op-46121-DAP)
Walton County (1:19-op-45423-DAP)

/s/ Keith Jackson

Keith Jackson
RILEY & JACKSON, P.C.
3530 Independence Drive
Birmingham, AL 35209
(205) 879-5000
(205) 879-5901(Fax)
www.rileyjacksonlaw.com

Counsel for the City of Lynn Haven (19:op-46006-DAP)

/s/ William E Robertson Jr.

William E Robertson Jr. (FL Bar No. 436607)
THE ROBERTSON LAW FIRM PA
1990 9th Street, Suite 100
Sarasota, FL 34236
(941) 364-2455
bill@robertson.law

Counsel for City of Palmetto (1:18-op-46055-DAP) and City of Sarasota (1:18-op-45513-DAP)

/s/ Eric Romano

Eric Romano (FL Bar No. 120091)
ROMANO LAW GROUP
801 Spencer Drive
West Palm Beach, FL 33409
(561) 533-6700
(561) 533-1285 (Fax)
eric@romanolawgroup.com

Counsel for

Bradford County (1:19-op-45564-DAP)
City of Apopka (1:19-op-45883-DAP)
City of Coral Springs (1:19-op-46123-DAP)
City of Daytona Beach (1:19-op-45598-DAP)
City of Daytona Beach Shores (1:19-op-45587-DAP)
City of Deltona (1:19-op-45586-DAP)
City of Florida City (1:19-op-45980-DAP)
City of Ft. Pierce (1:19-op-45595-DAP)
City of Homestead (1:19-op-45980-DAP)
City of Ocala (1:19-op-45834-DAP)
City of Ocoee (1:19-op-45966-DAP)
City of Oviedo (1:19-op-45584-DAP)
City of Palatka (1:19-op-45984-DAP)
City of Palm Bay (1:19-op-46132-DAP)
City of Port St. Lucie (1:19-op-45596-DAP)
City of Sanford (1:19-op-45599-DAP)
City of St. Augustine (1:19-op-45592-DAP)
City of Sweetwater (1:19-op-45914-DAP)
Clay County (1:19-op-45591-DAP)
Dixie County (1:19-op-45604-DAP)
Gilchrist County (1:19-op-45605-DAP)
Hamilton County (1:19-op-45589-DAP)
Lake County (1:19-op-45588-DAP)
Manatee County (1:19-op-45044-DAP)
Marion County (1:19-op-45272-DAP)
Orange County (1:19-op-45797-DAP)
Putnam County (1:19-op-46122-DAP)
Seminole County (1:19-op-45565-DAP)
St. Johns County (1:19-op-45563-DAP)
St. Lucie County (1:19-op-45656-DAP)
Suwannee County (1:19-op-45590-DAP)
Taylor County (1:19-op-45597-DAP)
Town of Eatonville (1:19-op-46014-DAP)
Union County (1:19-op-45603-DAP)

/s/ Donald A. Broggi

Donald A. Broggi
SCOTT+SCOTT ATTORNEYS AT LAW LLP
230 Park Avenue, 17th Floor
New York, NY 10169
(212) 519-0518
dbroggi@scott-scott.com

Counsel for City of Jacksonville (1:18-op-46120-DAP)

/s/ Sara D. Aguiniga

Sara D. Aguiniga
MOTLEY RICE LLC
401 9th Street, NW, Suite 630
Washington, DC 20004
(202) 232-5504
saguiniga@motleyrice.com

Counsel for Sarasota County (1:18-op-45513-DAP), City of Clearwater (1:19-op-45009-DAP), and City of Miami (1:19-op-45335-DAP)

/s/ Annesley H. DeGaris

Annesley H. DeGaris
DEGARIS LAW
2 North 20th Street, Suite 1030
Birmingham, AL 35203
(205) 575-8000
adegaris@degarislaw.com

Counsel for Washington County (1:18-op-45523-DAP)

SO ORDERED this 4th day of May, 2022.

/s/Dan Aaron Polster
Hon. Dan Aaron Polster
United States District Judge